

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>IN RE:</b>  <b>KRISJENN RANCH, LLC, <i>et al</i></b>  <b>DEBTOR</b>	§ § § § §	<b>CHAPTER 11</b>  <b>CASE NO. 20-50805-rbk</b>  <b>(Jointly Administered)</b>
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**JOINT APPLICATION TO EMPLOY ACCOUNTANT  
DOUGLAS G. DEFFENBAUGH, C.P.A.**

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**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS. IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD. A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.**

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TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

KrisJenn Ranch, LLC, Krisjenn Ranch, LLC, Series Uvalde Ranch, and KrisJenn Ranch, LLC, Series Pipeline Row ("Debtors") respectfully makes this Joint application ("Application") to employ DOUGLAS G. DEFFENBAUGH, C.P.A. ("ACCOUNTANT") as accountant, representing as follows:

1. On April 27, 2020, Debtors filed a petition under Chapter 11 of the Title 11, United States Code.
2. Debtors have continued possession and management of their property as Debtors-in-Possession.
3. The Debtors had employed Jerry Miers as accountant; however, Miers sold his practice to Accountant. Therefore, Debtors wish to employ Accountant as their new accountant.

4. In connection with the performance of its duties and obligations as Debtors-in-Possession, the Debtors request authority to employ ACCOUNTANT as their accountant to assist Debtors with preparing financial statements and account entry adjustments, conduct Debtors' bookkeeping, prepare quarterly tax returns, and prepare tax returns at the rates set forth in Exhibit "A" ("Deffenbaugh Engagement Letter").

5. Debtors have selected this accountant because of their experience and knowledge in matters of this character and the Debtors believes this accountant is well qualified to represent the Debtors, as debtors in possession, in this case. Furthermore, it is necessary for the Debtors, as debtors in possession, to employ ACCOUNTANT for such professional services.

6. In compliance with 11 U.S.C. §329 and Rule 2014, DOUGLAS G. DEFFENBAUGH has attached a declaration as Exhibit "B" detailing the connections with the Debtors or any party-in-interest. To the extent Exhibit "B" discloses any connection, the Debtors believe it is not sufficient to prohibit employment as counsel.

#### **Statement of Disinterestedness**

7. Based on the declaration of DOUGLAS G. DEFFENBAUGH attached as Exhibit "B" ("Declaration of Proposed Accountant"), the Debtors believe ACCOUNTANT is a "disinterested person" as that term is defined by 11 U.S.C. § 101(14). Other than set forth in this Jointly Administered Debtor's Application to Employ, ACCOUNTANT has no connections with the debtors, creditors, any other party-in-interest, respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, and has no interest adverse to the Estate that would disqualify ACCOUNTANT from employment.

**Employment**

8. Debtors have transferred all files to Mr. Douglas G. Deffenbaugh.

WHEREFORE, the Debtors hereby request that they be authorized to employ DOUGLAS G. DEFFENBAUGH, C.P.A. on at the rates set forth on Exhibit "A" and that the Debtors have such other and further relief as is just.

Dated: September 3, 2020

Respectfully Submitted,

MULLER SMEBERG, PLLC

By: /s/ Ronald J. Smeberg.

RONALD J. SMEBERG

State Bar No. 24033967

MULLER SMEBERG, PLLC

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ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

I hereby certify that on September 3, 2020, true and correct copies of the foregoing motion will be forwarded electronically via the Court's ECF System, or by U.S. first class mail, postage prepaid, on, all parties listed on the attached Service List.

/s/ Ronald J. Smeberg

RONALD J. SMEBERG

# SERVICE LIST

## **DEBTOR**

	101 West Main Street Nacogdoches, Texas 75961	Dallas, Texas 75243
KrissJenn Ranch, LLC 410 Spyglass Rd McQueeney, TX 78123-3418	Rusk County 202 N Main St, Henderson, Texas 75652	Craig Crockett CRAIG M. CROCKETT, PC 5201 Camp Bowie Blvd. #200 Fort Worth, Texas 76107

## **GOVERNMENT ENTITIES**

Office of the UST 615 E Houston, Room 533 PO Box 1539 San Antonio, TX 78295-1539	Shelby County, Tax Collector 200 St. Augustine St. Center, Texas 75935	Christopher S. Johns JOHNS & COUNSEL PLLC 14101 Highway 290 West, ste 400A Austin, Texas 78737
U.S. Attorney Attn: Bkcy Division 601 NW Loop 410, Suite 600 San Antonio, Texas 78216	Tenaha ISD Tax Assessor-Collector 138 College St Tenaha, TX 75974-5612	Timothy Cleveland CLEVELAND TERRAZAS PLLC 4611 Bee Cave Road, ste 306B Austin, Texas 78746
Internal Revenue Services Special Procedures Branch 300 E. 8 <sup>th</sup> St. STOP 5026 AUS Austin, TX 78701	Uvalde Tax Assessor Courthouse Plaza, Box 8 Uvalde, Texas 78801	Andrew R. Seger KEY TERRELL & SEGER 4825 50th Street, ste A Lubbock, Texas 79414

## **NOTICE PARTIES**

Texas Comptroller of Public Account Attn: Bankruptcy P.O. Box 149359 Austin, TX 78714-9359	METTAUER LAW FIRM c/o April Prince 403 Nacogdoches St Ste 1 Center, TX 75935-3810	<b>SECURED CREDITORS</b>  McLeod Oil, LLC c/o John W. McLeod, Jr. 700 N Wildwood Dr Irving, TX 75061-8832
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Angelina County Tax Assessor 606 E Lufkin Ave, Lufkin, Texas 75901	Albert, Neely & Kuhlmann 1600 Oil & Gas Building 309 W 7th St Fort Worth, TX 76102-6900	<b>UNSECURED CREDITORS</b>  Bigfoot Energy Services 312 W Sabine St Carthage, TX 75633-2519
Nacogdoches County Tax Assessor Collector	Laura L. Worsham JONES, ALLEN & FUQUAY, LLP 8828 Greenville Ave.	

C&W Fuels, Inc.	PO Box 175
Po Box 40	Fulshear, TX 77441-0175
Hondo, TX 78861-0040	

Davis, Cedillo & Mendoza	DMA Properties, Inc.
755 E Mulberry Ave Ste 500	896 Walnut Street at
San Antonio, TX 78212-3135	US 123 BYP
	Seneca, SC 29678

Granstaff Gaedke & Edgmon  
5535 Fredericksburg Rd Ste 110  
San Antonio, TX 78229-3553

Hopper's Soft Water Service  
120 W Frio St  
Uvalde, TX 78801-3602

Larry Wright  
410 Spyglass Rd  
Mc Queeney, TX 78123-3418

Medina Electric  
2308 18th St.  
Po Box 370  
Hondo, TX 78861-0370

Medina's Pest Control  
1490 S Homestead Rd  
Uvalde, TX 78801-7625

Texas Farm Store  
236 E Nopal St  
Uvalde, TX 78801-5317

Uvalco Supply  
2521 E Main St  
Uvalde, TX 78801-4940

Longbranch Energy  
c/o DUKE BANISTER  
RICHMOND